

REMARKS

The Office Action dated May 14, 2004 has been received and carefully noted. The following remarks are submitted as a full and complete response thereto.

Claims 1-27 are pending in the present application. Thus, claims 1-27 are respectfully submitted for consideration.

Claims 1-27 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Patent No. 5,344,105 (*Youhannaie*). The Office Action took the position that *Youhannaie* taught each and every element of independent claims 1 and 22-27. Applicant respectfully submits that the pending claims are not disclosed or suggested by *Youhannaie*.

Claim 1, upon which claims 2-21 are dependent, recites a method for providing a user of a first user equipment with navigation guidance. The first user equipment is configured for wireless communication. The method includes generating location information regarding a second user equipment configured for wireless communication while the second user equipment is moving along a path of movement. The method also includes generating navigation information based on the location information substantially in real-time. The method also includes presenting navigation guidance by means of a first user equipment based on the generated navigation information for enabling a user of the first user equipment to follow the second user equipment.

Claim 22 recites a communication system having at least one transceiver for wireless communication with mobile user equipment. The communication system

includes positioning means for generating location information regarding a mobile user equipment while a mobile user equipment is moving along a path of movement. The communication system also includes a controller for generating navigation information based on the location information in real-time. The communication system also includes a user interface for presenting navigation guidance for a mobile user based on the generated navigation information for enabling the mobile user to follow the mobile user equipment.

Claim 23 recites a mobile user equipment configured for wireless communication. The mobile user equipment includes means for receiving location information regarding a second mobile user equipment that is moving along a path of movement. The mobile user equipment also includes a controller for generating navigation information based on the received location information in real-time. The mobile user equipment also includes a user interface for presenting navigation guidance for a mobile user based on the generated navigation information for enabling the mobile to follow the second mobile user equipment.

Claim 24 recites a communication system having at least one transceiver for wireless communication with mobile user equipment. The communication system includes positioning means for generating location information regarding a mobile user equipment while a mobile user equipment is moving along a path of movement. The communication system also includes generating means for generating navigation information based on the location information in real-time. The communication system

also includes presenting means for presenting navigation guidance for a mobile user based on the generated navigation information for enabling the mobile user to follow the mobile user equipment. Claim 25 recites a mobile user equipment including some of the features recited in claim 24.

Claim 26 recites a communication system having at least one transceiver for wireless communication with a mobile user equipment. The communication system includes a positioning device configured to generate location information regarding a mobile user equipment while a mobile user equipment is moving along a path of movement. The communication system also includes a controller configured to generate navigation information based on the location information in real-time. The communication system also includes a user interface configured to present navigation guidance for a mobile user based on the generated navigation information for enabling a mobile user to follow the mobile user equipment.

As discussed in the specification, examples of the present invention enable presenting navigation guidance for enabling a user of a first user equipment to follow a second user equipment. Examples of the present invention also provide an arrangement so that the route taken by a moving mobile station can be reproduced in substantial real-time. Thus, information regarding the route taken by a user of a target mobile station can be utilized, such as by another mobile user, so that the other user may follow the route taken by the target mobile station. Information regarding the route of the target mobile station can be provided in a substantial real-time manner, such that the following mobile

user may follow the same route even if the following user is far behind the target user. It is respectfully submitted that the cited reference of *Youhannaie* fails to disclose or suggest all the elements of any of the presently pending claims. Therefore, *Youhannaie* fails to provide the critical and unobvious advantages discussed above.

Youhannaie relates to relative guidance using the global positioning system (GPS). *Youhannaie* describes a first vehicle 20 locating a target with an onboard sensor and converting the location of the target into the frame of reference of the GPS satellites. *Youhannaie* also describes guiding a missile to a target 28 using the GPS satellites with the missile by measuring its position in the GPS reference frame using its GPS receiver. First vehicle 20 communicates the target position to a navigation system of the missile that proceeds to the target location using the positioning signal from its GPS receiver. A second vehicle 30 proceeds to the target location provided from first vehicle 20 in the frame of reference of the GPS under control of its navigation system using the positioning signal derived from second GPS receiver 32 fixed to receive positioning signals from selected constellation 46 of satellites. Thus, second vehicle 30 remains within a sufficiently small operating distance of the position of first vehicle 20 such that variations and systematic bias errors between first GPS receiver 24 and second GPS receiver 32 are negligible. Thus, *Youhannaie* describes navigating the arrival of the missile at target 28. *Youhannaie*, however, does not disclose or suggest the feature of presenting navigation guidance by means of a first user equipment based on generated

navigation information for enabling a user of the first user equipment to follow a second user equipment.

In contrast, claim 1 recites "presenting navigation guidance by means of a first user equipment based on the generated navigation information for enabling a user of the first user equipment to follow the second user equipment." Claim 22 recites "a user interface for presenting navigation guidance for a mobile user based on the generated navigation information for enabling the mobile user to follow the mobile user equipment." Claim 24 recites "presenting means for presenting navigation guidance for a mobile user based on the generated navigation information for enabling the mobile user to follow the mobile user equipment." The remaining independent claims also recite these features. Applicant submits that *Youhannaie* does not disclose or suggest at least these features of the presently pending claims.

Applicant submits that *Youhannaie* does not disclose or suggest that navigation guidance is presented for enabling a user of the first user equipment to follow the second user equipment. The Office Action alleges that first vehicle 20 of *Youhannaie* teaches the second user equipment recited in the claims and that missile 30 teaches the first user equipment recited in the claims. Applicant submits, however, that a user in *Youhannaie* of missile 30 does not follow first vehicle 20. As noted above, *Youhannaie* relates to the field of remote guidance of vehicles such that the direction of missile 30 is controlled remotely through first vehicle 20. This aspect of *Youhannaie* does not disclose or suggest presenting navigation guidance by means of a first user equipment based on generated

navigation information for enabling a user of the first user equipment to follow the second user equipment.

Youhannaie describes that guidance, as in the phrase "remote guidance of vehicles," is used in the context of a process by which the flight path of a missile is controlled in flight. This aspect of *Youhannaie* does not disclose or suggest the claimed feature of presenting navigation guidance. The recited navigation guidance is offered by some means, visual or other means, to the user of the first user equipment for this user to be informed of the location of the second user equipment and, therefore, for the user to then be able to choose how to act on this information. This feature is distinguishable from the remote guidance of a missile described in *Youhannaie* that has navigation information automatically used to control the direction of the motion of the missile. *Youhannaie* does not disclose or suggest how the missile could present navigation guidance to a user thereof.

Further, the system of *Youhannaie* describes navigating the arrival of the missile at target 28. In contrast, claim 1 recites enabling a user of the first user equipment to follow the second user equipment. Applicant submits that these features are distinguishable because the missile of *Youhannaie* will be traveling towards the target and will not necessarily follow its path. Claim 1, however, describes the first user equipment in the application receiving guidance in order for it to follow the same path as the second user equipment. *Youhannaie* does not disclose or suggest these features of the presently pending claims.

Therefore, applicant submits that *Youhannaie* does not disclose or suggest all the features of claims 1-27. Applicant respectfully requests that that anticipation rejection of these claims in view of *Youhannaie* be withdrawn.

Claims 1-27 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,463,374 (*Keller et al.*) The Office Action took the position that *Keller* taught each and every element of independent claims 1 and 22-27. Applicant respectfully submits that *Keller* does not disclose or suggest all the features of any of the presently pending claims.

Claims 1-27 are summarized above. Applicant submits that at least the features discussed above regarding *Youhannaie* are not disclosed or suggested by *Keller*.

Keller relates to a "form line" following guidance system. *Keller* describes precision farming methods using GPS. The first form line is defined, for example, by a user during the operation of spraying a field. GPS positioning data obtained while following the first form line is used to compute a second form line that accounts for the width of the spraying pattern. The second form line is updated according to one or more deviations from the computed path. New GPS data is collected during these steps of following and deviating from the second form line and new positions are computed from the new GPS data. A form line following apparatus includes a vehicle fitted with a GPS receiver configured to receive GPS data and GPS correction information, and to compute form line following information. *Keller*, however, does not disclose or suggest the feature of presenting navigation guidance by means of a first user equipment based on

generated navigation information of enabling a user of the first user equipment to follow the second user equipment.

In contrast, as noted above, claim 1 recites "presenting navigation guidance by means of a first user equipment based on the generated navigation information for enabling a user of the first user equipment to follow the second user equipment." Further, as noted above, claims 22-27 also recite some of the features of claim 1. Applicant submits *Keller* does not disclose or suggest at least these features of claims 1-27.

Applicant submits that *Keller* does not disclose or suggest presenting navigation guidance for a mobile user based on generated navigation information for enabling the mobile user to follow mobile user equipment. *Keller* does not disclose or suggest a second user equipment configured for wireless communication and moving along a path of movement. Further, *Keller* does not disclose or suggest a first user equipment, such as the spraying vehicle, to follow any second user equipment. The Office Action alleges that the form line teaches the second user equipment, as recited in the claims. Applicant submits that *Keller* does not disclose or suggest this feature because the form line is an imagined line and is not a piece of equipment configured for wireless communication. Thus, applicant submits that *Keller* does not disclose or suggest all the features of claims 1-27. Applicant respectfully requests that the anticipation rejection of claims 1-27 in view of *Keller* be withdrawn.

Thus, it is submitted that each of claims 1-27 recites subject matter that is neither disclosed nor suggested by the cited references. It is therefore respectfully requested that all of claims 1-27 be allowed, and this application be passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



William F. Nixon
Registration No. 44,262

Customer No. 32294
SQUIRE, SANDERS & DEMPSEY LLP
14TH Floor
8000 Towers Crescent Drive
Tysons Corner, Virginia 22182-2700
Telephone: 703-720-7800
Fax: 703-720-7802

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Enclosures: